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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
Revision of the Commission's Rules)
To Ensure Compatibility with)
Enhanced 911 Emergency)
Calling Systems)

CC Docket No. 94-102
DA 98-2323

South Central Utah Telephone Associations' Request for Waiver of Section 20.18(c) of the Commission's Rules

South Central Utah Telephone Association, "South Central" has a Digital PCS company operating in the "F band" in the "St. George" BTA as designated by the FCC. This company operates under the umbrella of South Central Communications and is known as "South Central Wireless". At this time, "South Central" is unable to comply with the requirement of Section 20.18(c), specifically the requirement that TTY users be able to access 911 over digital wireless phones. Therefore, as directed by the Commission in its *Order*¹, "South Central" is filing this petition to request a waiver of Section 20.18(c), of the Commission's rules and to demonstrate its commitment to and plans for, complying with Section 20.18(c).

By way of background, on November 13, 1998, the Wireless Telecommunications Bureau released an *Order* extending through December 31, 1998, the suspension of enforcement of Section 20.18(c) of the Commission's Rules, as that section relates to the transmission of 911 calls made from TTY devices using digital wireless systems.

² In the same *Order*, the Commission also established procedures under which wireless carriers subject to the requirements of Section 20.18(c) may petition the Commission, not later than December 4, 1998, for waiver of the above requirement.³ According to the Commission, any waiver granted will take effect on January 1, 1999, after the suspension of enforcement expires.⁴

The Commission mandated that carriers filing petitions for waiver specify with sufficient particularity answers to three questions.⁵ Below is the "South Central" response to the questions posed by the Commission.

Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, CC Docket No. 94-102, Order, RM-8143 (rel. Nov. 13, 1998) ("*Order*").
See Order at 4.

Id. at 3-4.

Id. at 2.

Id. at 3-4.

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What steps is "South Central" taking or does it intend to take to provide users of TTY devices with the capability to operate such devices in conjunction with digital wireless phones?

- South Central's wireless switching vendor (Nortel), states that it is technically impossible for South Central to comply with the Commission's rules governing TTY access to 911 over digital IS-95 CDMA air interface systems, until appropriate equipment is commercially available.
- As an interim measure, South Central will not recommend the sale of its digital PCS equipment to any customer that requires the use of TDD. To avoid any confusion, there will be no TDD or TTY devices offered from South Central to our end customers, until the issues with this technology are resolved to our satisfaction.
- Nortel is working with other equipment manufacturers and carriers to define the required design standards needed to develop this service.
- South Central continues to request, from Nortel, any updates with respect to their position on this issue. Nortel has earlier responded in writing that they are working with other vendors to define and design standards for the service and that it will require more time and work to resolve the issue. To date, Nortel has no offering or solutions for South Central's present CDMA network.
- South Central has held internal discussions regarding the problem and feels there is nothing it can do internally to correct the problem. It is a technology problem that must be resolved by vendors and developers who build and supply wireless equipment as well as the end customer equipment used for TDD purposes.

When does "South Central" intend to make this capability available to TTY users?

- It's South Central's understanding, the Wireless industry has been working with consumer representatives and TTY manufacturers in the TTY Forum for almost two years, but there is still a lack of standards needed in the TTY industry. South Central has no idea how long it will take the equipment vendors to resolve the issues surrounding the problem; however Nortel states that past history tells them that it typically takes twelve to eighteen months from the adoption of standards to the commercial availability of the finished product; however there is still a lack of standards.
- South Central is waiting to see what new products become commercially available, before it can understand whether its initial offering will be a voice-based or data-based solution.
- As stated above; as of yet the companies working on standards and development haven't arrived with a solution for the CDMA technology and we have no idea what may arise in the development process in the future; however "South Central," like other wireless carriers using the digital CDMA technology, can only monitor the progress and hope it comes quickly and economically.

What reasonable steps will "South Central" take to address the consumer concerns referenced in the September 30th Order?

- It's South Central's understanding that; if the content of a call is corrupted by TTY consumer devices, used by speech or hearing disabled users, our Nortel system will not be able to correct the errors. Nortel states that the vast majority of TTYs are not designed to connect to wireless handsets, and such lack of good connections frequently corrupts messages before they reach the wireless system. There are some TTY equipment models that have connections that facilitate properly connecting handsets and the TTY, but Nortel believes few are in use. Nortel does not currently manufacture wireless handsets, and is unable to resolve this connectivity problem. In addition, Nortel is not aware of any TTY that has been designed for its tones to be carried error free over digital vocoders designed for human speech. Therefore, the digital audio path is more prone to create text errors more frequently than text messages over analogue audio paths. Once again the lack of standards is complicating the task of providing text-messaging capability for those with hearing and speech disabilities.
- South Central continues to wait to see what standards will do for implementing venter provided features such as TTY callers having the ability to visually monitor all aspects of call progress provided to voice users.
- South Central is also waiting to see what new products become commercially available, to interface with PCS CDMA technology, before it can address TTY offerings such as: (1) volume control; (2) vibrating ring signal indication; (3) VCO/HCO capabilities; (4) call information, *i.e.*, ANI/ALI; (5) any other functional characteristics

"South Central" is aware of the obligation to make submissions every three months in order to maintain the waiver that is being requested. If after three months, "South Central" is not able to meet the requirements of Section 20.18(c), "South Central" will be seeking another waiver.

Respectfully submitted,

Brant Barton
Assistant Manager
South Central Utah Telephone Association